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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #8**
Pilsen Soil Operable Unit 2 Residential
C5N8RV02
Chicago, IL

To: Bruce Everetts, Illinois EPA
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From: Ramon Mendoza, On-Scene Coordinator
Date: 7/20/2017
Reporting Period: 7/5/2017 to 7/21/2017

1. Introduction

1.1 Background

Site Number:	C5N8RV02	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	8/3/2015
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	2
Mobilization Date:	12/19/2016	**Start Date:**	12/20/2016
Demob Date:		**Completion Date:**	
CERCLIS ID:	ILN000504472	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

This time critical removal action is a PRP lead under an EPA Unilateral Administrative Order.

1.1.2 Site Description

Pilsen Soil Operable Unit 2 (OU2) Residential Site : Operable Unit (OU) 2 is a residential area bounded by West 18th Place to the north, a north-south alley between South Allport Street and South Racine Avenue to the east, West 21st Street to the south, and South Loomis Street to the west. There are about 178 residential properties in this 25-acre OU2 site. About 116 of the properties have non-permanent covers in their yards such as bare soil, grass or gravel and are the focus of EPA actions. In 2010, approximately 1,563 people lived within the boundaries of the Site, and the residential yards have high accessibility to sensitive populations including young children and pregnant women.

1.1.2.1 Location Chicago, Illinois 60608

See Site Description

1.1.2.2 Description of Threat

The lead concentration in surfaces soils are above the EPA screening level of 400 mg/kg lead in residential yards and gardens. Residents living in these homes may be exposed to the lead in these surface soils.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA conducted Site Assessment activities in 2013 to 2015 with additional residential parcels in 2016 sampled. Lead was found in surface soils in the residential yards and gardens above the EPA removal management level of 400 parts per million. The average Site surface soil lead concentrations were 1,412 mg/kg. There is an estimated population of around 1,563 people including children living, walking, working, and playing on the contaminated surface soils in the Site. These people have a high accessibility to residential yards including sensitive populations such as young children and pregnant women. EPA's risk assessment concluded that the soil concentrations of lead at the Site are at an unacceptable risk level to the residents accessing the Site.

(H.Kramer's contractor) had representatives on-site to oversee the removal work. Removal work was also conducted by GHD's contractor RW Collins. START and/or EPA OSC, documented property specific removal activities by recording field notes and by taking photographs. Air monitoring as required by OSHA was conducted by GHD.

2.1.2 Response Actions to Date The following work was conducted from 7/5/2017 to 7/21/2017. (Work from Dec.2016 through June 30, 2017 is documented in POLREPs #1 to 7).

Work was conducted after H. Kramer's contractor (GHD) contacted the owners and agreed on a scope of work in writing. Below is a removal status summary of each of the properties: All but one of the properties are 3-4 ft. below the street level with limited access, which made excavation work more difficult and time consuming. GHD conducted project management, particulate air monitoring during excavation and backfill activities at the residential areas. RW Collins contractor/laborers conducted the physical excavation and backfilling of soil and also managed the soil at the H. Kramer property staging area.

In general, lead contaminated soil was excavated by hand with shovels and fed into a vacuum hose to the vacuum truck. After it was filled the truck was driven to the H. Kramer truck yard and the soil was transferred to steel containers, which are then transported for disposal to a solid waste landfill (Waste Management, Laraway) in Joliet IL. Clean soil was transferred from the flatbead truck to the yard by conveyor belts, shovels and wheelbarrows to backfill. An orange fence marker was placed at the bottom of the excavation before backfillin. Final surface cover could be gravel, soil, or sod (new grass), depending on the owner preference. (Note: HazChem is called to pump out rainwater in excavations , due to rains, on an as needed basis.)

Air monitoring for particulates were below OSHA PEL criteria during this reporting period. No fugitive dust was observed by the OSC during this reporting period. Workers wore level D with rubber booties and gloves. GHD provided a boot wash to protect workers and minimize soil migration outside of the work area. Removal work was conducted at eight homes during the reporting period, with 6 completed with owner approval.

During this Period, EPA started using the EPA XRF as a tool to analyze the bottom of excavations for lead. EPA may allow shallower excavations (less than 2 feet) if the lead in soil is less than the cleanup goal of 400 mg/kg lead. EPA conducted a statistical study comparing lab vs. XRF results; to enable the use of the XRF results only to determine if cleanup goals have been achieved.

Non-Responsive **6/29 to 7/14/2017** - The backyard garden of this residence is about 3-4 feet below street level and is divided to the east and west sections with apple trees on both sides. The soil was excavated to 2 feet on the east side. Soil was excavated around the trees to the extent feasible without damaging the roots. The west side garden was excavated to 1 ft. only because cleanup levels using an XRF and lab data was achieved (75 mg/kg lead). Both gardens were backfilled with clean soil and mixed with compost soil (40 bags) at the request of the home owner. All the apple trees were left in place. The owner approved and signed off on the work conducted. Work is complete.

Non-Responsive **7/6 to 7/17/2017** - The front area of this property consisted of brick pile, garbage, & debris (of unknown depth) with a thin layer of lead contaminated soil. This area had very limited access, but the owner requested help. RW Collins leveled out this area and covered with 6 inches of clean soil. The backyard T shaped garden was excavated to 2 feet and backfilled with clean soil a large tree was left in place and soil around it was excavated to the extend feasible. The owner approved and signed off on the work conducted. Work is complete.

Non-Responsive **7/6 to 7/10/2017 -** The garden area is about 3-4 feet below street level and is a 2 ft strip along the home running north and south with concrete and brick support beams. There was another small garden area in the back area. Soil was excavated to two feet in the gardens except for areas close to support beams (at least 10 inches, additional depth would may compromise structural integrity of home). Heavy rains filled the excavations. RW Collins called HazChem to pump out the standing water (85 gallons) to enable backfilling to start. Excavations were backfilled with clean soil with an orange marker at the bottom. The owner approved and signed off on the work conducted. Work is complete.

Non-Responsive **7/10 to 7/13/2017 -** The front yard is at street level and was excavated down to 1 ft. The soil was replaced with clean soil (with an orange marker at the bottom)l and a fresh layer of sod was installed. There was a two foot strip on the east side that was excavated at about 8 inches due to the presence of a gas line. The owner approved and signed off on the work conducted. Work is complete.

Non-Responsive **7/13/2017 -** The small (about 20 x 3ft.) backyard (soil) of this property was excavated to one foot (with an orange marker at the bottom) and replaced with crush gravel at the owner's request. The owner approved and signed off on the work conducted. Work is complete.

Non-Responsive - The work consisted of excavations in small areas in the front and backyard yards which were backfilled with gravel (only in the backyard) at the owner's request. The owner approved and signed off on the work conducted. Work is complete.

Non-Responsive **7/14 to 7/21/2017 -** Excavations were initiated in these backyards during this period and are ongoing.

Additional home access : Homeowners approach GHD with request for soil cleanup at two additional homes with yards and gardens during this reporting period.

ATSDR Consultation 7/13-14/2017 - At the request of OSC Mendoza. Dr. Mark Johnson visited the site to speak to one of the owners to address his concerns regarding gardening in lead contaminated soil and the past health problems in his family. Dr. Johnson addressed his concerns and will continue to stay in contact as needed.

Media Interest: There was no media interest on site from 6/05 to 6/16/2017.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

amount of homes above the lead screening level of 400 mg/kg which needed to be cleaned up.

2.1.4 Progress Metrics :

As of July 21, 2017, 26 residential parcels have undergone cleanup or have been removed from the cleanup list.. The owner installed a concrete driveway in one of these homes, eliminating the exposure pathway and need for cleanup.

As of the week of July 21, /2017. H Kramer's contractors have disposed of about 219 tons of non-hazardous lead contaminated soil to the solid waste landfill facility in Joliet, IL.

Waste Stream	*Medium*	*Quantity*	*Manifest /Ticket#*	*Treatment*	*Disposal*
Soil		10.16 tons	851385		Laraway RDF, Waste Management, Joliet, IL. Shipped 12/22/2016
Soil		9.42 tons	889972		Laraway RDF, Waste Management, Joliet, IL. Shipped 4/26/2017
Soil		11.98 tons	890592		Laraway RDF, Waste Management, Joliet, IL. Shipped 4/27/2017
Soil		12.39 tons	891212		Laraway RDF, Waste Management, Joliet, IL. Shipped 4/28/2017
Soil		7.95 tons	894904		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/08/2017
Soil		11.98 tons	896484		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/10/2017
Soil		13.78 tons	898993		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/16/2017
Soil		13.71 tons	900453		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/18/2017
Soil		11.89 tons	900819		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/19/2017
Soil		10.49 tons	901772		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/23/2017
Soil		10.92 tons	902005		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/23/2017
Soil		9.66 tons	902633		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/24/2017
Soil		10.65 tons	904544		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/31/2017
Soil		11.78 tons	904744		Laraway RDF, Waste Management, Joliet, IL. Shipped 5/31/2017
Soil		12.69 tons	915148		Laraway RDF, Waste Management, Joliet, IL. Shipped 6/20/2017
Soil		10.51 tons	912918		Laraway RDF, Waste Management, Joliet, IL. Shipped 6/19/2017
Soil		12.71	923037		Laraway RDF, Waste Management, Joliet, IL. Shipped 7/17/2017
Soil		14.29	923543		Laraway RDF, Waste Management, Joliet, IL. 7/18/2017
Soil		12.56	925351		Laraway RDF, Waste Management, Joliet, IL. 7/21/2017

2.2 Planning Section

2.2.2 Issues :

EPA has started using the XRF to screen the bottom of excavations to assist in accelerating the cleanup. Safety is number one priority to make sure crews and community are safe.

There is Gang activity in the area we are working with the owners to let them know who we are where we are working and making sure identification vest are worn onsite at all times. Police are aware of our work area.

2.3 Logistics Section

In addition to the crew and hand tools, work is supported by a vac truck, one skid steer, one flatbed truck, 10 yard containers, 3 1X10 foot conveyor belts, and two pickup trucks.

2.4 Finance Section

2.4.1 Narrative

The START total budget ceiling is currently $120,000. Of this amount, approximately $74,190 (as of July 20, 2017) has been spent overseeing the responsible party contractor removal activities, overseeing responsible party contractor sampling activities, and collecting/analyzing soil samples under the EPA Administrative Order on Consent. Additional funds were utilized for technical support for the Unilateral Administrative Order for the Site. This additional budget is estimated to fund START's continued oversight work and cleanup support through Sept. 2017

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
TAT/START	$120,000.00	$74,190.00	$45,810.00	38.18%
Intramural Costs				
Total Site Costs	$120,000.00	$74,190.00	$45,810.00	38.18%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Ramon Mendoza, EPA OSC; Paul Pallardy or Cordell Renner(EPA START)
Walt Pochron, Ivan Navarro; GHD (H. Kramer contractor)

2.5.2 Liaison Officer

EPA Community Relations: Heriberto Leon

2.5.3 Information Officer

EPA PIO: Francisco Arcaute, Rachel Bassler

3. Participating Entities

3.1 Unified Command

None

3.2 Cooperating Agencies

City of Chicago, Alderman Solis Office
City of Chicago Dept. of Public Health;
Illinois EPA
ATSDR

4. Personnel On Site

Pilsen OU2 Removal – Personnel Counts Notes: START is EPA's oversight contractor GHD and RW Collins are H. Kramer Contractors.					
Date	EPA	GHD	RW Collins	EPA/START	
6/19-6/30/2017	1 OSC	2	5	1 (present onsite on as needed basis	

6. Additional sources of information

6.1 Internet location of additional information/report

https://www.epa.gov/il/pilsen-area-soil-site

6.2 Reporting Schedule

POLREPS will be issued every two weeks as appropriate.

7. Situational Reference Materials

See link for the Site at: https://www.epa.gov/il/pilsen-area-soil-site